

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

In re: Bair Hugger Forced Air Warming  
Devices Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates To:  
All Actions

**WORD COUNT COMPLIANCE  
CERTIFICATE FOR  
DEFENDANTS' RESPONSE TO  
PLAINTIFFS' OBJECTION TO  
MAGISTRATE JUDGE'S ORDER  
BARRING PLAINTIFFS' NEW  
GENERAL CAUSATION EXPERT  
OPINIONS**

---

I certify that Defendants' Response to Plaintiffs' Objection to Magistrate Judge's Order Barring Plaintiffs' New General Causation Expert Opinions complies with the length limitations set forth in LR 7.1(f), as well as the type size requirements set forth in LR 7.1(h).

I further certify that in preparation of this memorandum, I used Microsoft® Office Word 2016, and the word processing program has an appropriate functioning word count tool applied specifically to include all text, including headings, footnotes, and quotations.

I further certify that the above-referenced memorandum contains 3472 words.

Dated: October 18, 2018

Respectfully submitted,

*s/Benjamin W. Hulse*

Jerry W. Blackwell (MN #186867)  
Benjamin W. Hulse (MN #0390952)  
Mary S. Young (MN #0392781)  
BLACKWELL BURKE P.A.  
431 South Seventh Street, Suite 2500  
Minneapolis, MN 55415  
Phone: (612) 343-3200  
Fax: (612) 343-3205  
Email: blackwell@blackwellburke.com  
bhulse@blackwellburke.com  
myoung@blackwellburke.com

Lyn Peebles Pruitt  
MITCHELL WILLIAMS SELIG  
GATES & WOODYARD  
425 West Capitol Avenue, Suite 1800  
Little Rock, AR 72201-3525  
Phone: (501) 688-8869  
Fax: (501) 688-8807  
Email: lpruitt@mwlaw.com

Bridget M. Ahmann (MN #016611x)  
FAEGRE BAKER DANIELS LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402  
Phone: (612) 766-7000  
Fax: (612) 766-1600  
Email: bridget.ahmann@faegrebd.com

**Counsel for Defendants 3M Company  
and Arizant Healthcare Inc.**